

Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

As an employee of Video Relay Service (VRS) provider and deaf user , I have the great pride of seeing professional interpreters to communicate by videophone in American Sign Language using VRS. I can see big difference toward to the deaf community in their quality of their lives such as having progress for their job opportunity and quality of communication between hearing and deaf users.

I am proud to be a US citizen and a contributing member of my community. I am also honored to able to help make a difference with my current job as a language mentor, where I assist Video Relay Interpreters? in improving their ASL communication skills. The Americans with Disabilities Act (ADA) requires the FCC to make available all deaf individuals nationwide ?functionally-equivalent? communication. Using sub-par Video Equipment, VRS services or Interpreters DOES NOT provide functional equivalency!

As you will soon determine the future of VRS . When you set the VRS rate, carefully consider the impact that rate will have on deaf US citizens, who depend on VRS to achieve personal and professional independence. As a proud US Citizen, I believe in capitalism and a system where competition is encouraged and businesses strive to provide a wide depth of quality services/products and reap the rewards of their success.

I was very disappointed that NECA proposed the tiered VRS Reimbursement Rate system. I do not understand how the NECA committee determined the last rate ranges. There is a large discrepancy between the first two rates and the third. It will be impossible for any VRS providers to do business at the rate proposed for the third tier of reimbursement. Determining a rate on the limited items that are considered reimbursable is not only ridiculous but unorthodox. What technology based business runs only on the front line service providers, management, and an office space? How absurd that you would not consider the cost of high-speed internet, phone lines, equipment for the interpreters, initial

training, on-going training, professional development/certification, operational support, call forecasting, reporting, accounting services, billing, technological advancement/enhancement? All of these things are required by the FCC regulations, yet they are not considered in the reimbursement rate submissions. That is just plain ridiculous! My employer has already informed me that if these proposed rates are adopted, our company would head into bankruptcy. This would be disastrous for deaf VRS users and the thousands of employees that work for the 12 plus VRS providers. Additionally ? If my company should go bankrupt because of the rate, the other VRS providers WILL NOT be able to handle call volume. This will have a devastating impact on the Deaf community as a whole! Also, bankruptcy would impact myself as well as hundreds of deaf employees who have found an opportunity to earn a living ? therefore preventing them from being a burden on the government. If this rate goes into effect, the deaf individuals who work for the VRS companies will join the ranks of the hundreds of thousands of out of work individuals across the country. Once out of work, these individuals will become a burden on the system, rather than continuing to be contributing members of society. Right now ? WE are making a difference, please do not take away this fundamental aspect of OUR American Dream.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve services levels. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. Monthly payments for broadband are a big expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals. How can the FCC continue to DEMAND more from VRS providers ? under the umbrella of functional equivalence ? and at the same time cut the rate paid for Video Relay services? That just doesn't make any sense! The only conclusion I can make is that the FCC wishes to be in direct conflict with the ADA.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do. All I am asking is that you let me ? a Deaf US Citizen ? have a chance of MY American Dream! I assure you that Deaf Citizens of this country cannot achieve the American Dream on a TTY ? WE ALL need VRS Access! FCC ? DON'T SHATTER OUR DREAMS!!!!!!